

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
JOY MONIQUE MILLER)	Case No. 17-34329-KRH
)	Chapter 13
Debtor)	

MOTION TO INCUR DEBT

COMES NOW, the Debtor, by counsel, and as and for her Motion to Incur Debt, states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on August 29, 2017.
2. The Debtor has applied for and Credit Acceptance Corporation has approved a loan to the Debtor in the amount of \$14542.90 plus interest at 17.99% per annum to be repaid with a loan term of 57 months and monthly payments of \$382.42 for the purchase of a 2013 Ford Edge or similar vehicle.
3. The Debtor needs to purchase the referenced vehicle as her current vehicle has broken down and she needs a replacement vehicle to travel to and from work and other matters.
4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate her ability to perform under her Chapter 13 Plan filed herein.
5. The Court previously entered an order granting the Debtor's Motion to Incur Debt for a loan with DriveTime. DriveTime has since withdrawn its approval of said loan.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

5. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor requests that the Court enter an Order approving the aforesaid loan on the terms stated herein and for such other relief as the Court may deem appropriate.

JOY MONIQUE MILLER

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on July 28, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record who have signed up to receive such notification and by first class mail to the parties on the attached list.

/s/ James E. Kane
James E. Kane

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:)	
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JOY MONIQUE MILLER)	Case No. 17-34329-KRH
)	Chapter 13
Debtor)	

NOTICE OF MOTION

The above Debtor has filed Motion to Incur Debt in the above matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, within twenty-one (21) days from the date of this Notice you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **July 29, 2020 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: July 28, 2020

JOY MONIQUE MILLER

By: /s/ James E. Kane

Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtor

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/s/ James E. Kane

James E. Kane

Label Matrix for local noticing

Scolopax, LLC

Wollemi Acquisitions, LLC c/o AIS Portfolio

0422-3

C/O WEINSTEIN & RILEY, PS

4515 N Santa Fe Ave. Dept. APS

Case 17-34329-KRH

2001 WESTERN AVENUE, STE 400

Oklahoma City, OK 73118-7901

Eastern District of Virginia

SEATTLE, WA 98121-3132

Richmond

Fri Jun 5 15:26:47 EDT 2020

United States Bankruptcy Court

Acceptance Now

American Medical Collection

701 East Broad Street

Attn: Bankruptcy

PO Box 1235

Richmond, VA 23219-1888

5501 Headquarters Dr

Elmsford, NY 10523-0935

Plano, TX 75024-5837

Ashley Funding Services, LLC its successors

CAC Financial Corp.

(p)CAPITAL ONE

assigns as assignee of Laboratory

2601 NW Expressway

PO BOX 30285

Corporation of America Holdings

Oklahoma City, OK 73112-7236

SALT LAKE CITY UT 84130-0285

Resurgent Capital Services

PO Box 10587

Greenville, SC 29603-0587

Capital One

Cardiology Associates of Richm

Cardworks/CW Nexus

Attn: Bankruptcy

P O Box 740776

Attn: Bankruptcy

Po Box 30253

Cincinnati, OH 45274-0776

Po Box 9201

Salt Lake City, UT 84130-0253

Old Bethpage, NY 11804-9001

Commonwealth of Virginia

(p)CREDIT ADJUSTMENT BOARD INC

Credit Collection Services

Department of Taxation

8002 DISCOVERY DRIVE

725 Canton St.

PO Box 2156

SUITE 311

Norwood, MA 02062-2679

Richmond, VA 23218-2156

RICHMOND VA 23229-8601

Department Stores National Bank

Fingerhut

John Randolph Med Ctr

c/o Quantum3 Group LLC

6250 Ridgewood Rd

P. O. Box 740760

PO Box 657

St Cloud, MN 56303-0820

Cincinnati, OH 45274-0760

Kirkland, WA 98083-0657

John Randolph Medical Center

Labcorp

Laboratory Corporation of Ameri

Resurgent Capital Services

P.O. Box 2240

7311 Boulder View Ln

PO Box 1927

Burlington, NC 27216-2240

Richmond, VA 23225-4953

Greenville, SC 29602-1927

(p)LENDMARK FINANCIAL SERVICES

MERRICK BANK

MIDLAND FUNDING LLC

2118 USHER ST

Resurgent Capital Services

PO BOX 2011

COVINGTON GA 30014-2434

PO Box 10368

WARREN, MI 48090-2011

Greenville, SC 29603-0368

Mr. Holland

Navient

Navient Solutions, LLC. on behalf of

Attn: Bankruptcy

Educational Credit Management Corporatio

Po Box 9500

PO BOX 16408

Wilkes-Barr, PA 18773-9500

St. Paul, MN 55116-0408

Navy Federal Cr Union

Navy Federal Cr Union

Office of the U. S. Attorney

Po Box 3000

Po Box 3700

Suntrust Building

Merrifield, VA 22119-3000

Merrifield, VA 22119-3700

919 East Main Street, Suite 1900

Richmond, VA 23219-4622

Patient First c/o Receivables Management Sys
PO Box 8630
Richmond, VA 23226-0630

(p) PORTFOLIO RECOVERY ASSOCIATES, LLC
PO BOX 41067
NORFOLK VA 23541-1067

Professional Account Services
P.O. Box 188
Brentwood, TN 37024-0188

Quantum3 Group LLC as agent for
MOMA Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

Receivable Management Inc
7206 Hull Street Rd Ste
North Chesterfield, VA 23235-5826

Richard A. Cordle, Treasurer
Chesterfield County
P.O. Box 26585
Richmond, VA 23261-6585

Riverview Physicians for Women
439 Jennick Dr
Colonial Heights, VA 23834-4901

Santander Consumer USA
Po Box 961245
Ft Worth, TX 76161-0244

Scolopax, LLC
c/o Weinstein & Riley, P.S.
2001 Western Ave, Ste 400
Seattle, WA 98121-3132

Sleep Clinics of America Inc
P.O. Box 35690
Richmond, VA 23235-0690

Southside Regional Medical Cen
P O Box 501128
Petersburg, VA 23803-0000

(p) SPRINGLEAF FINANCIAL SERVICES
P O BOX 3251
EVANSVILLE IN 47731-3251

Synchrony Bank/ JC Penneys
Po Box 965007
Orlando, FL 32896-5007

TREASURER CHESTERFIELD COUNTY
P.O BOX 70
CHESTERFIELD, VA 23832-0906

The CBE Group
Payment Processing Center
PO Box 2193
Waterloo, IA 50704-2193

Transworld Systems
Collection Agency
500 Virginia Dr., Suite 514
Fort Washington, PA 19034-2733

US DEPARTMENT OF EDUCATION
CLAIMS FILING UNIT
PO BOX 8973
MADISON, WI 53708-8973

Us Dept Of Ed/Great Lakes Higher Educati
2401 International Lane
Madison, WI 53704-3121

Us Dept Of Ed/Great Lakes Higher Educati
Attn: Bankruptcy
2401 International Lane
Madison, WI 53704-3121

Virginia Department of Tax
P.O. Box 2369
Richmond, VA 23218-2369

Virginia Emergency Group
PO Box 660627
Mailstop: 42643574
Dallas, TX 75266-0827

Visa Dept Store National Bank/Macy's
Attn: Bankruptcy
Po Box 8053
Mason, OH 45040-8053

Wollemi Acquisitions, LLC
AIS Portfolio Services, LP
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Carl M. Bates
341 Dial 866-813-0912 Code: 8576180
P. O. Box 1819
Richmond, VA 23218-1819

James E. Kane
Kane & Papa, PC
1313 East Cary Street
P.O. Box 508
Richmond, VA 23218-0508

Joy Monique Miller
21200 Hampton Ave.
South Chesterfield, VA 23803-2269

Judy A. Robbins
Office of the U.S. Trustee - Region 4 -R
701 E. Broad Street, Suite 4304
Richmond, VA 23219-1849

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One	Credit Adjustment Board	Lendmark Financial Services
15000 Capital One Dr	8002 DISCOVERY DR RM 311	2118 Usher St
Richmond, VA 23238-0000	Richmond, VA 23229-0000	Covington, GA 30014-0000

Portfolio Recovery Associates	(d)Portfolio Recovery Associates, LLC	Springleaf Financial Services
P.O. Box 12914	POB 41067	3323 South Crater Road
Norfolk, VA 23541-0000	Norfolk VA 23541	Suite A
		Petersburg, VA 23805-0000

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Wollemi Acquisitions, LLC, c/o AIS Portfol	(d)Wollemi Acquisitions, LLC, c/o AIS Portfol	End of Label Matrix	
4515 N Santa Fe Ave. Dept. APS	4515 N Santa Fe Ave. Dept. APS	Mailable recipients	57
Oklahoma City, OK 73118-7901	Oklahoma City, OK 73118-7901	Bypassed recipients	2
		Total	59